

**FILED**  
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US DISTRICT COURT E.D.N.Y.

★ OCT 06 2017 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE

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SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

- against - :

RECOIN GROUP FOUNDATION, LLC, DRC :  
WORLD INC. a/k/a DIAMOND RESERVE CLUB, :  
and MAKSIM ZASLAVSKIY, :

Defendants. :  
-----X

17 Civ. 5725 (RJD)

ECF Case

**STIPULATION AND [PROPOSED] ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned  
attorneys for the parties that:

1. The document production deadline now set for October 2, 2017 by the Rule 45  
subpoena issued by Plaintiff Securities and Exchange Commission ("Commission") to  
Defendants REcoin Group Foundation, LLC, DRC World, Inc. a/k/a Diamond Reserve Club, and  
and Maksim Zaslavskiy shall be adjourned until 9:00 a.m. on November 1, 2017.

2. The deposition of Defendant Zaslavskiy now scheduled for October 4, 2017, shall  
be adjourned until 9:00 a.m. on November 3, 2017.

3. Defendant Zaslavskiy shall dismiss without prejudice the action styled Zaslovsky  
v. US Securities and Exchange Commission, 17-mc-00375 (LGS) (S.D.N.Y.).

4. Defendants shall provide to the Commission within forty-eight (48) hours of this  
stipulation being signed by the Parties a full list of bank and brokerage accounts (including but  
not limited to checking, saving, money market, IRA, 401(k), lines of credit, and securities  
accounts) under their name, jointly or individually, or under their control, and any blockchain  
addresses through which investor funds were solicited or received.

5. If approved by the Court, the deadlines set forth in the Order to Show Cause, Temporary Restraining Order, and Order Freezing Assets and Granting Other Relief (the "OSC") (DE #3) shall be amended to provide:

- a. The sworn verified accounting ordered by Paragraph XII of the OSC shall be due by October 30, 2017;
- b. The opposing papers in response to the OSC ordered by Paragraph XV of the OSC shall be due by November 17, 2017;
- c. The Commission's reply papers ordered by Paragraph XV of the OSC shall be due by November 20, 2017; and
- d. The hearing on the order to show cause ordered by Paragraph I of the OSC shall be adjourned to <sup>2:00pm December 8,</sup> ~~10:00 a.m. on November 21, 2017~~, or until such E M M  
~~other date as the Court may provide.~~

6. If approved by the Court, the following orders, currently set to expire on Friday, October 13, 2017, shall be extended up and until the conclusion of the hearing on the order to show cause as set forth in paragraph 5(d) herein, or until such date as the Court has held the preliminary injunction hearing contemplated by the OSC, or until such time as the Court modifies any portion of the order based on a joint stipulation by the parties:

- a. The temporary restraining orders imposed by paragraphs V, VI, and VII of the OSC;
- b. The asset freeze imposed by paragraph VIII of the OSC, provided that the parties may at a subsequent time stipulate for the removal of certain accounts from the purview of the asset freeze;
- c. The repatriation order imposed by paragraph IX of the OSC; and

d. The order against destruction of documents imposed by paragraph X of the OSC.

7. Nothing in this stipulation shall be construed as affecting the parties' rights and responsibilities under all other parts of the OSC, including but not limited to Defendant Zaslavskiy's obligation to surrender his passport and not leave the United States under the conditions set forth in paragraph XIII of the OSC, the Commission's right to pursue expedited discovery as per the terms of paragraph XI of the OSC, and the Commission's right to serve discovery requests and other filings as per the terms of that paragraph and of paragraph XV of the OSC.

Dated: New York, New York  
October 4, 2017

SECURITIES AND EXCHANGE COMMISSION

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Zaslavskiy

  
SO ORDERED

s/ RJD

  
UNITED STATES DISTRICT JUDGE